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February 14th, 2014

California Energy Commission  
Media and Public Communications Office  
1516 Ninth Street, MS-29  
Sacramento, CA 95814-5512  
Attn: Harinder Singh  
RE: Docket No 13-AAER-1

Mr. Singh:

I am writing to request that you include my comments as part of the official response to your request for public input pertaining to the proposed changes in the appliance efficiency standard.

My chief concern with the proposed changes is the use of the ASHRAE 127-2007 test standard to certify computer room air conditioners. I believe the more current ASHRAE 127-2012 test standard should be used for the following reasons:

1. The newer standard was written in part as a response to the ASHRAE T.C. 9.9 Committee's 2011 version of the *Thermal Guidelines for Data Processing Environments*. These guidelines raise the supply and return air temperatures to maximize the overall energy efficiency of the computer room air conditioners. The return air temperature specified in ASHRAE 127-2007 is now the supply air temperature recommended in the ASHRAE T.C. 9.9 Committee's 2011 version of the *Thermal Guidelines for Data Processing Environments*. Highly efficient computer room air conditioners that are designed for the new, higher return and supply temperatures have not been optimized for the lower rating temperature specified in ASHRAE 127-2007. Units designed for these lower temperatures are rarely suitable for the new higher return temperatures because the suction gas that cools the compressors would be too warm to provide adequate cooling and therefore would lead to premature compressor failure.
2. Newer, highly efficient cooling technologies such as row and rack based cooling units which will be located right at the heat source are designed to see return temperatures of 95°F and above, if these units must be tested at a temperature 20°F less than their design return air temperature they will not meet the proposed SCOP's and therefore will be excluded from California. This would preclude the use of these highly efficient systems simply because they would be tested at return air temperatures that they were never intended to see. The newer ASHRAE 127-2012 allows for testing at 95°F and higher for computer room air conditioners that are designed to operate at these elevated temperatures.

Please give me a call at (240) 285-6975 if you have any questions for me. I look forward to speaking with you at the public comments meeting on February 18<sup>th</sup>.

Best regards,



-Applications Engineering Manager-  
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